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RICHARD W. NAGEL  
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Jane Doe

Plaintiff

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST DIV. COLUMBUS

Civil Action 2:22-CV-855

Judge Edmund A. Sargus Jr.

Magistrate Judge

Chelsey M Vascura

Deborah Bellar

Defendant

### Addition to Motion to Stay

I, Defendant Deborah Bellar, ask the court to allow this additional just cause to my Motion to Stay

1) I believe this issue to be implied under my previous statement of "all activities necessary" but I wanted to be very clear.

There exists material evidence that will be clear and compelling in my defense. While I am incarcerated I can not access this evidence nor can it be sent to me due to its contents and/or form.

2) In regards to gathering further evidence and speaking with witnesses, I am also unable to accomplish these tasks. There are known witnesses that I consider very important to my defense. I can not search for their contact information nor can I meet with them to obtain statements. These issues are directly a result of my incarceration and its restrictions/policies.

3) I received the Notice and instructions from the court regarding Rule 26(f) Report of the Parties. Obviously I can not access the form via either website. I attempted to get it through my limited resources here and was informed that it could not be provided to me.

Our general mail has transitioned to digital format so having it sent by family will also not work.

At some point I will have the option of printing my mail but this is a new process and I am unsure of the time involved to receive a copy once the print request is made.

I apologize, I will not be able to provide the court with the requested report at this time.

To the point, I do not have the most basic and/or common convenient abilities that other parties have to obtain evidence, witnesses and even completing/filing documents for the foundation of my defense.

I pray the court will consider all my extreme limitations and conclude that I can not reasonably defend myself while I am incarcerated. I ask that my motion for stay be granted



Respectfully submitted  
in Christ,  
Deborah Bellar  
Deborah Bellar 108945  
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